ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time:	May 11, 1999 / approximately 2:00 p.m.		
Site Contact(s):	Bob Cathel	**Phone:**	966-6880
Regulatory Contact:	Chris Gilbreath	**Phone:**	692-3371
Agency:	Colorado Department of Public Health & Environment		

Purpose of Contact: Meeting with CDPHE regarding B779 issues.

Discussion
A meeting was held with Chris Gilbreath (CDPHE) to discuss three issues relative to B779. Attendees included Mike Conilogue, Ted Hopkins, Randy Leitner, Chris Gilbreath and myself. The topics of discussion and meeting notes follow.

Meeting Notes

Meeting with CDPHE (Chris Gilbreath)
May 11, 1999
Start - 2:00 p.m. End – 3:00 p.m.

- **Utilization of Process Waste System in B779**
  B779 currently has approximately 6530 gallons of cooling tower water that contains arsenic above the RCRA characteristic level, which needs to be treated in B374. B779 is provided cooling water by two 8-inch supply lines and one 6-inch supply line. Return water to the cooling tower is provided by two 8-inch return lines and one 6-inch return line. Water lines penetrate building 779 in rooms 127 and 142. 8-inch lines and 4-inch lines provide water into these rooms. An estimation of the total cooling tower water in the system is 6530 gallons. Approximately 6020 gallons can be transferred into a tanker truck for transport to B374 for processing.

  The remaining 510 gallons (which is in the 8 and 4-inch lines in rooms 127 and 142) would need to be transferred to B776 via the existing process waste line from B779 to the tanks in B776. This water will be drained from low point drains by hose to the process waste system. In room 127, the low point drain is approximately 20 feet from the process waste drain and 100 feet from tank T-5. In room 142, the low point drains

are approximately 130 feet from the process waste drain in room 127. Process waste piping from the drain in 127 to tank T-5 is approximately 65 feet. The piping from tank T-5 to the tanks in B776 is approximately 700 feet.

After transfer of the 510 gallons through the process waste system, the lines will be flushed with water that does not contain RCRA constituents. An effort will be made to collect a sample at the end of the flushing (at or near the B776 tanks) to be analyzed for arsenic. Anticipation is that the sample will not contain arsenic above the RCRA level. The process waste line will continue to be used for other non-RCRA fluid transfers.

Chris wanted to know how we would document this activity and Ted suggested that a field modification to the B779 DOP would be appropriate. Chris agreed to this approach. Chris would also like to be provided with a schematic of the portion of the PWS we will be utilizing and what portions of the cooling tower would be drained into this system. Also, Chris asked for a description of the flushing and sampling activities and an anticipated schedule for completion of all of the tasks discussed.

- **Management of Dust Suppression Water**
  Mike explained that B729 has been surveyed, and passed, for free-release. B779 D&D project personnel are planning on using water to mitigate dust from the demolition of B729. Mike was concerned because the DOP states that liquid remediation waste must be processed in specified treatment units on-site. Chris astutely pointed out that this water did not constitute a remediation waste and he did not have any issues with using water for dust suppression.

- **Fume Hood Characterization**
  In regard to the B779 Hoods, CDPHE indicated in our previous meeting that the top of the hood did not carry the F-listing. (Not contaminated directly by listed waste.) Therefore, if we are going to conduct any further sampling (e.g., to meet the WAC of EnviroCare) we might want to consider separating the top from the bottom of the hood. Mike indicated that it is possible that after conducting an extraction or destruction debris treatment technology, these hoods might meet "Clean Debris Standards". In addition, Mike pointed out that not all of these hoods handled listed hazardous wastes.

- **Pond Sludge Removal Project**
  It was discussed briefly that RMRS is proposing utilizing SuperSacks for the storage of pond sludge, after addition of absorbent to ensure at least >50% solids content. These SuperSacks would eventually be transported to the ultimate disposal facility (which at this time is EnviroCare). Chris asked that we provide him with the SuperSack specifications (especially regarding DOT information).

Contact Record Prepared By: Bob Cathel, RMRS, Environmental Compliance

Distribution:

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